WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION Community Nutrition Programs Child and Adult Care Food Program

Guidance Memorandum 9C: For Child and Adult Care Food Program Sponsoring Organizations and Independent Centers (Child Care Component)

Topic: Recordkeeping Requirements for the Child and Adult Care Food Program

Date: June 2009

The purpose of this memo is to provide institutions participating in the Child and Adult Care Food Program (CACFP) with a list of the records they are required to keep. These records will be examined during CACFP audits and reviews and must be kept for three years following the fiscal year to which they pertain.

A. Contract Agreement Materials

- 1. CACFP Permanent Agreement/Policy Statement (PI-1486-AP).
- 2. Base year CACFP Application (PI-1486).
- 3. Renewal CACFP Application (PI-1486-R).
- 4. Approved Site Application for each participating site (PI-1487 or PI-1487-C for sponsors of unaffiliated sites).
- 5. News media release, with date sent to local media and where the release was sent.
- 6. Contracts for meals provided by a vendor and/or food service management company.
- 7. For-profit centers only—Documentation of child care reimbursement under Title XX (Community Aids Funding) for at least 25 percent of the children enrolled or 25 percent of licensed capacity, whichever is less, for the month preceding approval in the CACFP, and for each month meals were claimed for reimbursement; OR
 - Documentation that at least 25 percent of the enrolled children or 25 percent of licensed capacity, whichever is less, are from households that meet the income eligibility requirements for the free and reduced price categories of CACFP reimbursement for each month meals were claimed for reimbursement.
- 8. Documentation of compliance with the nondiscrimination regulations indicated in Guidance Memorandum 8C.
 - a. A record of the potential eligible beneficiaries by racial/ethnic category for the area served.
 - b. A record of the actual participation data by racial/ethnic background.
 - c. An information sheet on the CACFP to be made available for inquiries about child care.
- 9. Evidence that parents of enrolled children receive current information on the importance and benefits of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and WIC income eligibility guidelines. See attached pages for current information that can be handed out or posted for parents to see.

NOTIFY DPI of CHANGES: It is critical to notify the institution's assigned consultant of any changes to the contract information that occur during the contract year. In particular, changes in an institution's owner, Federal Employer Identification Number (FEIN), board president, authorized representative for the CACFP, license to provide child care, meals approved for reimbursement, and changes from self-prepared to purchased meals are contract amendments that must be reported. Failure to report these changes and have them approved by DPI could result in meal payments being disallowed and having to return money that has been received.

B. Attendance and Enrollment Records

- 1. Attendance records as required by the Department of Children and Families (DCF) licensing regulation DCF 251.04(6)(b), that is, a current, accurate written record of the daily attendance and date of birth of each child for the length of time the child is enrolled in the program. The actual time of arrival and departure for each child shall be recorded if hours of arrival and departure vary among children. DPI/USDA may review attendance records in formats as needed to determine compliance with CACFP regulations. This may include, but is not limited to original daily sign in/out attendance records, electronic reports of daily attendance, and attendance records maintained for Wisconsin Works (W-2) subsidy payments.
- 2. Enrollment forms for each participant (except those in "at-risk" after school hours care sites, outside of school hours centers, and emergency shelters) that include information on each child's normal days and hours in care and meals normally received while in care, updated annually by a parent or guardian. See *Guidance Memorandum 6C* for more detailed information about this requirement.
- 3. Household Size-Income Statements for each child who qualifies at the free or reduced reimbursement rates and any income statements submitted by households that have been determined to be non-needy. This form is included in *Guidance Memorandum 1C*.

4. The "Household Size-Income Record" which indicates the eligibility status (free, reduced, or non-needy) of each enrolled child for each month reimbursement is claimed. This form is included in *Guidance Memorandum 1C*. Preapproval from DPI is required if an alternative form is used.

C. Meal Count Records

- 1. Daily records of the number of children served at each meal, by type (breakfast, a.m. snack, lunch, p.m. snack, supper, and/or additional snack). The meal count must be recorded either during the meal or immediately following the meal. The attached *Daily Participation Record and Monthly Meal Count Summary* can be used to record this information. Computerized recordkeeping systems that assume children have been served a meal based on times of attendance do not meet the definition of a time of service meal count, and may not be used as the source for the number of meals served to children reported on the claim for reimbursement.
- 2. Infant meal records for each meal claimed for reimbursement for infants from birth through 11 months old. The attached Infant Meal Records must show the type and amount of food served to each infant by appropriate age category (Birth through 3 Months, 4 Months through 7 Months, 8 Months through 11 Months). See the website to download forms for centers approved to claim meals other than breakfast, lunch, and one snack. When these records show that an infant has been provided with a meal that meets the infant meal pattern shown in *Guidance Memorandum 12C*, the infant meal can be included in the total meal count. The attached *Daily Participation Record and Monthly Meal Count Summary* can be used to record the total infant meal counts for the month at the bottom if they have not been included in the daily totals above.
- 3. An agency that claims reimbursement for more than two meals and one snack or two snacks and one meal must use the attached *Greater Than Three Meals* form. This weekly form lists the first and last names of each child in attendance to ensure that each child is being claimed for no more than two meals and one snack or two snacks and one meal per day (for centers that operate more than five days per week, contact your assigned consultant for additional forms). An agency may use another method than the *Greater Than Three Meals* form if it can be explained how this alternate method will ensure that reimbursement is not claimed for more than two meals and one snack or two snacks and one meal per child per day. The alternate method must be pre-approved by the Department of Public Instruction (DPI) as part of the site application approval.

D. Menu and Production Records

- 1. Daily, dated menus for each approved meal service, including any substitutions made. This requirement also applies to centers that purchase meals from a school, health care facility, or food service vendor.
- 2. Daily, dated production records for each approved meal service reflecting the total quantity of each food item used in the preparation of the meal. For infants 0 to 12 months, record the type and amount of food served to each child on the Infant Meal Record (attached). For children one year and over, the quantities should not be listed in terms of individual serving sizes. All quantities should be expressed in terms of can size, weight, or volume. Production records must be completed which assure that the amount of food to be prepared and made available to the anticipated number of children and adults at each meal service provides, at a minimum, the portion sizes required by the CACFP Meal Pattern for each child and adult to be served. Write the number of children by age group and adults to be served on the production records. Sample forms are attached. See the website to download forms for centers approved to claim meals other than breakfast, lunch, and one snack. Numbers of youth served who are 13 or older (those in "at-risk" after school hours care sites) can be included with the numbers of 6-12 year olds, although USDA recommends that snack portion sizes larger than those for the 6-12 year old group be given to adolescents. Emergency shelters are not required to maintain production records.
- 3. When meals are purchased from a school, health care facility, or food service vendor, the vendor must maintain full and accurate records that the agency will need to meet this responsibility, including daily production records listing the total amount of food prepared, and daily delivery records listing amounts of food supplied.

E. Training and Monitoring Documentation

- Documentation of CACFP-related training sessions, including date(s), location(s), topics, and names of participants.
- 2. Documentation of CACFP nutrition-related activities with children.
- 3. Sponsoring Organizations must provide training at least once a year for key staff to review program requirements. New staff should be thoroughly trained before beginning their work in the program. The Sponsoring Organization must keep a written record to document the location and date of each training session given, the names of staff present and the topics covered, as specified in *Guidance Memorandum 5C*. A sample form with required key topics, suggested optional topics, and space for staff to sign in is attached.
- Sponsoring Organizations must complete site reviews for each CACFP site as outlined in Guidance Memorandum 5C, which includes the required review forms.

F. Procurement, Contracting, Leasing Documentation

- Records documenting informal or formal competitive procurement procedures as described in Guidance Memorandums 4 and 13C.
- 2. Current contracts, rental, or lease agreements.
 - a. Meals provided by a vendor and/or a food service management company.
 - b. Goods or services required to administer the CACFP, e.g., accounting services, equipment rental, consulting, etc.

G. Expense and Income Records (Guidance Memorandum 11 contains complete instructions.)

- 1. Documentation for all expenditures identified as food service costs.
 - a. Itemized receipts, invoices, purchase orders for food and nonfood purchases.
 - b. Time sheets or time studies for food service labor.
 - c. A payment summary or disbursement/expense ledger with all food service costs reported under the appropriate headings and clearly identified as food service costs.
- 2. Documentation of all income received for the food service operation.
 - a. CACFP reimbursement check and/or advance check stubs/transmittal notices.
 - b. Deposit slips which show specific amounts deposited for food service.
 - c. Any income from meals served, such as to cover the cost of program or non-program adults, non-enrolled children or, if a pricing program, to enrolled children. (Program adults perform necessary labor, paid or donated, for the food service program. This includes menu planning, preparing and serving of meals, cleanup after meals, supervision of participants during meals, and on-site recordkeeping. Nonprogram adults do not perform any necessary labor in support of the food program. Nonprogram adults include visiting relatives, licensing inspectors, DPI or USDA personnel. Maintain records of the number of meals served to non-program adults.)
 - d. Other income specifically designated for food service, e.g., gifts, donations, payments for meals sold to other agencies/institutions.
 - e. A receipt or income ledger which records and clearly identifies all food service income.